

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX-----X
ADAM KIDRON,

Plaintiff,

-against-

CENTURY SURETY COMPANY

Defendant.
-----X

Index No.

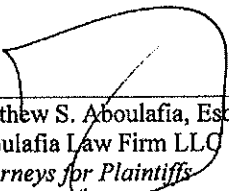
SUMMONS

Plaintiff's Address:

1075 Grand Concourse, Apt. #6R
Bronx, NY 10452The basis of the venue designated
is:

Plaintiff's Address

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer on the Plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York and in case of your failure to Answer, judgment will be taken against you by default for the relief demanded in the annexed Complaint with interest from the date the cause of action arose, costs, disbursements and attorneys fees.

Dated: New York, New York
February 4, 2020
Matthew S. Aboulafia, Esq.
Aboulafia Law Firm LLC
Attorneys for Plaintiffs
228 East 43rd Street, Suite 1700
New York, NY 10017
(212) 684-1422TO:
Century Surety Company
c/o Demetriou General Agency, Inc.
415 Madison Avenue, 13th Floor
New York, NY 10017

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX-----X Index No.
ADAM KIDRON,

COMPLAINT

Plaintiff,

-against-

CENTURY SURETY COMPANY

Defendant.

-----X

Plaintiff, by his attorneys, Aboulafia Law Firm LCC, as and for his Complaint, herein
allege upon information and belief as follows:

THE PARTIES

1. At all times hereinafter mentioned, Plaintiff ADAM KIDRON, is an individual residing at 1075 Grand Concourse, #6R, Bronx, NY 10452.
2. At all times hereinafter mentioned, Plaintiff ADAM KIDRON had and continues to have an ownership interest and insurable interest in the property located at 430 West 250th Street, Bronx, NY. ("Subject Premises")
3. At all times hereinafter mentioned, Defendant CENTURY SURETY COMPANY ("Century") was and still is a business entity, licensed, admitted and/or engaged in the business of providing liability insurance and being an insurer in the State of New York, and located at 465 Cleveland Avenue, Westerville, Ohio 43082.
4. At all times hereinafter mentioned, Defendant Century designated Demetriou General Agency, Inc. as its company representative for service of suit, with an address of 415 Madison Avenue, 13th Floor, New York, NY 10017,

5. At all times hereinafter mentioned, Defendant was and is authorized by the Department of Financial Services of the State of New York to engage in the business of insurance in the State of New York and to issue policies of insurance including the policy herein sued upon.

RELEVANT FACTS

6. On or about August 2012, Plaintiff retained the services of Sun Dragon Industries Corp. ("Sun Dragon") to perform certain renovation and construction work at the subject premises.
7. On or about March 2014, Sun Dragon abandoned the construction/renovation project leaving the premises in a state of disrepair with damages sustained throughout the subject premises as a result of Sun Dragon's negligence.
8. On November 26, 2014, Plaintiff commenced suit against Sun Dragon for negligence, amongst other theories of liability. The suit was filed in the Supreme Court of the State of New York, County of New York, bearing Index No. 653667/2014. ("Underlying Action")
9. Notice of the suit was provided to Sun Dragon's liability carrier, Defendant Century Surety Company, under Policy No. CCP784252.
10. On November 26, 2014, Defendant Century disclaimed coverage to Sun Dragon and to Plaintiff for the claims asserted by Plaintiff in the underlying action.
11. Ultimately, the underlying action proceeded to Inquest, and on May 31, 2019 a judgment was granted to Plaintiff as against Sun Dragon in the amount of \$4,470,390.18, plus interest from January 1, 2016.
12. The decision was then converted into a Judgment in the amount of \$5,964,068.12, and was duly filed with the Clerk of the Court on September 16, 2019.

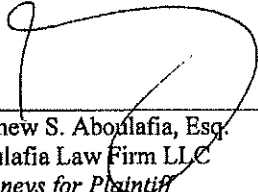
13. On January 2, 2020, Notice of Entry of the decision granting Plaintiff's Inquest and the Judgment was served upon Sun Dragon and Defendant Century, and was duly filed with the court.
14. To date, no portion of the Judgment has been satisfied by either Sun Dragon or Century.

**AS AND FOR A FIRST CAUSE OF ACTION AGAINST
DEFENDANT**

15. Pursuant to New York Insurance Law §3420(2), Plaintiff has standing to file suit directly against Defendant Century to recover the judgment entered against its insured, Sun Dragon.
16. Pursuant to Sun Dragon's policy with Century, ISO Form CG 00 01 12 07, Plaintiff has standing to file suit directly against Century to recover the judgment entered against its insured, Sun Dragon.
17. That Sun Dragon's policy with Century provides coverage for damages to the subject premises that are separate and apart from Sun Dragon's "product" or "work."
18. That Century breached the terms and conditions of its policy with Sun Dragon, and improperly disclaimed coverage for all the damages sustained to the subject premises.
19. That the subject policy contains a limit of insurance of \$1,000,000 for each occurrence.
20. That at least \$1,000,000 of Plaintiff's damages fall within the coverage provided under the subject policy, and as such Defendant is required to indemnify Plaintiff up to the policy limit.
21. Defendant has failed or otherwise refused to indemnify Plaintiff for the damages sustained despite Plaintiff's compliance with Insurance Law §3420(2), as well as all the terms and conditions of the subject policy.
22. As a result of Defendant's breach of contract, Plaintiff has been damaged in the sum of at least \$1,000,000.00.

WHEREFORE, it is respectfully requested that Plaintiff has judgment against Defendant on the First cause of action in the sum of at least \$1,000,000.00, and for costs and disbursements of this action.

Dated: New York, New York
February 4, 2020



Matthew S. Aboulafia, Esq.
Aboulafia Law Firm LLC
Attorneys for Plaintiff
228 East 45th Street, Suite 1700
New York, NY 10017
(212) 684-1422

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX-----X
ADAM KIDRON,

Plaintiffs,

-against-

CENTURY SURETY COMPANY,

Defendants.
-----XSTATE OF NEW YORK)
 : ss.:
COUNTY OF BRONX)

Samantha McIsaac, being duly sworn, deposes and says:

1. I am over 18 years of age, and I am not a party to this action.
2. My business address is in the County of New York, State of New York.
3. On February 6, 2020, I served a true copy of the annexed, SUMMONS AND COMPLAINT, by hand delivery to J. Alcott (description below), an agent for Demetriou General Agency, Inc., authorized agent for service of process on behalf of Defendant Century Surety Company, at the address indicated below:

J. Alcott

Gender: Male
 Hair Color: Grey
 Eye Color: Brown
 Skin Tone: White
 Approximate Age: 50-65
 Approximate Height: 6'

Demetriou General Agency, Inc.
 One Liberty Plaza, Suite 1900
 New York, NY 10006

4. On February 10, 2020, service was completed by depositing a copy of the SUMMONS AND COMPLAINT WITH NOTICE OF ELECTRONIC FILING on 2/10/2020 in a postpaid, properly addressed envelope by first class mail, bearing the legend Personal & Confidential and not indicating legal action, in an official depository under the exclusive care and custody of the United States Post Office in the State of New York. Mailing was made to Demetriou General Agency, Inc., One Liberty Plaza, Suite 1900, New York, NY 10006 and Century Surety Company at 485 Cleveland Avenue, Westerville, Ohio 43082.

Sworn to before me this
 10th day of February 2020

Notary Public

JACK GLANZNER
 Notary Public, State of New York
 No. 02810241606
 Qualified in Kings County
 Commission Expires May 23, 2022


 Samantha McIsaac

INDEX OF STATE ACTION DOCUMENTS

- Exhibit A** The Summons and Complaint, Supreme Court of the State of New York,
Bronx County, Index Number 21746/2020E
- Exhibit B** February 10, 2020 Affidavit of Service